

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

ORLANDO RODRIGUEZ, et.al.,
Plaintiffs

Vs.

Civil No. 98-1548 (GG)
Consolidated with

Civil No. 97-2437 (GG)

CROWLEY TOWING AND TRANSPORTATION CO.
SEAFARERS INTERNATIONAL UNION
Defendants.

**PLAINTIFFS' RENEWED MOTION FOR STATUS CONFERENCE TO SET
DISCOVERY SCHEDULE FOR DEPOSITIONS AND DOCUMENTARY
PRODUCTION AND MOTION TO ALLOW FRANKLIN JARA, ESQ. TO BE
ADMITTED AS CO-COUNSEL FOR PLAINTIFFS.**

COME NOW THE PLAINTIFFS, through Counsel, and state:

1. Several matters HAVE BEEN PENDING before this Court for years such as Plaintiffs' motion for reconsideration of Court's denial to allow several Plaintiffs to join this lawsuit, Defendant's Motions for summary judgment, Plaintiff's motion for Court to enter a Rule 54(B) judgment so that an appeal can be taken on the claims that were not allowed to join this case, and several discovery requests propounded by the Plaintiffs that have been objected to by the Defendants. Additionally, The Plaintiffs have sought to depose several of Defendants' witnesses to no avail.
2. Franklin Jara, Esq. requests to appear pro hac vice before this Court as Co-Counsel for the Plaintiffs.
3. A one hour status conference is requested so that all outstanding discovery matters, etc... can be brought to the Court's attention and so that a discovery schedule can be established to conform with all Counsels' schedules for depositions of Defendants' witnesses and for the Defendants to respond to all outstanding discovery.
4. If allowable, the undersigned would request to participate at the status conference by phone since the undersigned is located in Miami, Florida.

5. The Plaintiffs have been prejudiced by not being able to proceed with their lawsuit for years as stated above and a status conference resolving all of these issues will be the most expeditious manner to move this case to trial.

WHEREFORE, THE PLAINTIFFS REQUEST A STATUS CONFERENCE AND TO ALLOW FRANKLIN JARA, ESQ. TO APPEAR AS CO-COUNSEL PRO HAC VICE FOR THE PLAINTIFFS.

Respectfully submitted,

J.H. Zidell, Esq.
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CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy of the foregoing was mailed by U.S. Mail OR FED EX to : Raquel M. Dulzaides at P.O. Box 366104, San Juan , Puerto Rico 00936-6104, Luis Suarez at Calle Felipe Goyco #503 San Juan, Puerto Rico 00915, and Ellen Silver, Esq., 5201 Auth Way, Camp Springs, Md. 20746 on this 12TH day of August, 2003.

By: _____

J.H. Zidell Esq.